

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CHARLOTTE WINELAND, Individually, and  
SUSAN WINELAND, as Personal  
Representative of the Estate of JOHN DALE  
WINELAND, Deceased

**Plaintiffs,**

V.

AIR & LIQUID SYSTEMS CORPORATION,  
et al.,

## Defendants.

NO. 2:19-cv-00793-RSL

**STIPULATED AND ORDER  
PERMITTING PLAINTIFFS TO NOTE  
THE FED. R. CIV. P. 30(B)(6)  
DEPOSITION OF DEFENDANT  
CARRIER CORPORATION AFTER THE  
DISCOVERY DEADLINE**

## STIPULATION

Pursuant to LCR 7(d)(1) and LCR 10(g), defendant Carrier Corporation and plaintiffs Charlotte Wineland and Susan Wineland hereby jointly request that the Court enter an order permitting plaintiffs to note the Fed. R. Civ. P. 30(b)(6) deposition of Carrier Corporation beyond the current deadline to complete discovery of August 9, 2020. Counsel for both parties met and conferred about the need to proceed with this deposition at this time, particularly in light of the evidentiary posture of this case and forthcoming dispositive motions, as well as in the midst of the Covid-19 pandemic and the accompanying travel and quarantine restrictions which make gathering documents and information and preparing and presenting a witness sufficiently prepared to respond to the breadth of topics requested by plaintiffs incredibly difficult. The parties have discussed the timing of the deposition and several different possible

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1 means for reducing costs associated with this deposition, including those enumerated in the  
 2 local rules, which will further judicial economy.

3 Counsel have agreed that postponing the Fed. R. Civ. P. 30(b)(6) deposition of Carrier  
 4 Corporation at this time will allow the parties adequate time to review the evidence in this case  
 5 and the necessity for this deposition at this time, continue to meet and confer on the necessity,  
 6 the timing and the scope of the deposition and various options that would help the parties to  
 7 avoid unnecessary discovery and costs, and reach an agreement in this regard and, hopefully,  
 8 avoid unnecessary discovery motions. The parties do not anticipate that conducting this  
 9 deposition after the discovery deadline will cause any other delay in litigating the case.

10 For these reasons that will aid the judicial economy, and also in light of the current  
 11 pandemic situation and Carrier Corporation's pending motion for summary judgment, the  
 12 parties agree that there is good cause to allow the deposition of Carrier Corporation to occur  
 13 beyond the current deadline to complete discovery of August 9, 2020.

14 This stipulation is intended to address the timing of the deposition relative to the current  
 15 discovery deadline only. The parties agree that Carrier Corporation expressly preserves and  
 16 does not waive any objections it may have to plaintiffs' notice of deposition unrelated to the  
 17 timing of the deposition after the current discovery deadline.

18 **STIPULATED BY:**

19 FROST LAW FIRM, PC

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**Attorneys for Defendant Carrier Corporation**

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## ORDER

Based on the foregoing stipulation of the parties, it is hereby ORDERED that the Fed.  
R. Civ. P. 30(b)(6) deposition of Carrier Corporation may occur by agreement of the parties  
after the current deadline to complete discovery of August 9, 2020.

Dated this 31st day of July, 2020.

Mrs Casnik

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Robert S. Lasnik  
United States District Judge

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